

DAYLE ELIESON  
United States Attorney  
District of Nevada

**MARK E. WOOLF**  
Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
Telephone: 702-388-6336  
Email: mark.woolf@usdoj.gov

*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LORENZO TUCKER, III,  
Plaintiff,  
v.  
JODONA L. BROWN, *et al.*,  
Defendants. )  
Case No. 2:18-cv-00962-JCM-CWH  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
**MOTION FOR EXTENSION  
OF TIME TO RESPOND**  
**(Second Request)**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Rule IA 6-1(a), the United States of America (“United States”), on behalf of Federal Defendant Jodona L. Brown (“Federal Defendant”), hereby moves for an additional 20-day extension of time, as measured from the current response deadline of July 24, 2018, to file its answer or other response. The new deadline would be **Monday, August 13, 2018**. This is the United States’ second request for extension and, as set forth herein, there is good cause for the request.<sup>1</sup>

As noted in its prior request, ECF No. 4, the plaintiff appears to be asserting either or both a *Bivens* claim and/or tort claim under the Federal Tort Claims Act against the Federal Defendant. The United States is making every attempt to broadly construe the plaintiff's complaint so as to adequately address all of the claims by way of responsive motion, but the

<sup>1</sup> Based on Plaintiff's most recent filing, ECF No. 6, he is currently incarcerated in the Clark County Detention Center. Because he is incarcerated, undersigned counsel is unable to speak with him directly to obtain the requested extension via stipulation.

1 complaint is scattered and largely incomprehensible as it relates to what might be considered  
2 specific claims and facts related thereto. Despite diligent effort, the United States needs the  
3 limited additional time to finalize review plaintiff's allegations, the incomplete documents  
4 attached thereto, and the record of the proceeding/s from which the complaint appears to stem to  
5 ensure a complete response. Moreover, subsequent to the prior request for extension, the named  
6 Federal Defendant in this action relocated outside of the District of Nevada. Given the  
7 inevitable delay in communication as a result of this relocation, the United States needs the  
8 limited additional time to confer with her to procure all necessary information and  
9 documentation in support of the responsive motion.

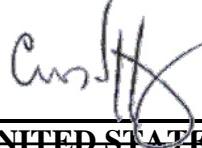
10 This extension is not sought for delay or any other improper purpose, but to allow the  
11 United States to ensure the evaluation of the claims asserted by the plaintiff and a complete,  
12 fulsome response thereto. Thus, for the reasons stated herein, the United States respectfully  
13 requests the instant motion extending time for the United States to file a response until  
14 **Monday, August 13, 2018**, be granted. The United States does not anticipate any further  
15 extensions will be necessary.

16 Respectfully submitted this 17th day of July 2018.

17 DAYLE ELIESON  
18 United States Attorney

19 */s/ Mark E. Woolf* \_\_\_\_\_  
20 MARK E. WOOLF  
21 Assistant United States Attorney

22 **IT IS SO ORDERED;**

23   
24 \_\_\_\_\_  
25 **UNITED STATES DISTRICT JUDGE**  
26 **UNITED STATES MAGISTRATE JUDGE**

27 DATED: July 18, 2018  
28 \_\_\_\_\_

1                   **CERTIFICATE OF SERVICE**

2       I, Mark E. Woolf, hereby certify that the foregoing **MOTION FOR EXTENSION OF**  
3       **TIME TO RESPOND (Second Request)** was served this date on all parties via the Court's  
4       Electronic Case Filing system, and as indicated below:

5                   **U.S. Mail:**

6       Clark County Detention Center  
7       Lorenzo Tucker, III  
8       ID #1523866  
9       330 S. Casino Center Blvd.  
Las Vegas, Nevada 89101

10      Dated this 17th day of July 2018.

11                   */s/ Mark E. Woolf* \_\_\_\_\_  
12                   MARK E. WOOLF  
Assistant United States Attorney